

**UNITED STATES OF AMERICA
DISTRICT OF MINNESOTA
Case No. 23-CR-315(2) (SRN/DTS)**

UNITED STATES OF AMERICA,)
)
plaintiff,)
v.)
)
Vannesa Violante-Lujano,)
)
defendant.)

JOINT MOTION FOR EXTENSION OF SCHEDULING ORDER

Vannesa Violante-Lujano, through counsel, Deborah Ellis, moves the Court on behalf of herself, co-defendant Moldanado and the Government for an extension of time by which to file trial documents identified by the Court in paragraph 1a. of the Trial Notice and Final Pretrial Order (Dk. # 65). Currently trial documents, including agreed-upon jury instructions are due in chambers by noon on November 12.

Counsel for Ms. Violante will be out of the country from November 11 through the 19th. While the parties have begun a discussion about proposed jury instructions, we have not had time to have a meaningful or productive meet and confer in this regard.

THEREFORE, the parties are jointly requesting that deadline for submitting the trial documents identified in paragraph 1a of Docket # 65 be extended to **November 20, 2024**. Further, the parties request that the deadline for filing the documents currently due to be filed by November 19 (paragraph 1a.iii, 1b and 1c to Docket # 65), be extended to **November 27, 2024**.

Date: November 8, 2024

RESPECTFULLY SUBMITTED,

/s/ deborah ellis

DEBORAH ELLIS

Atty. Reg. No. 14616X

101 East Fifth Street, Suite 1500

St. Paul, MN 55101

(651) 288-3554